



PELTON GRAHAM LLC

ADVOCATES FOR JUSTICE

October 26, 2023

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VIA ECF

The Honorable John P. Cronan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

The request is granted. The briefing schedule for Plaintiff's anticipated motion to dismiss is extended as detailed below. The Clerk of Court is respectfully directed to close Docket Number 21.

SO ORDERED.
Date: October 27, 2023
New York, New York

JOHN P. CRONAN
United States District Judge

Re: *Popa v. Cohen Brothers Realty Corporation, et ano.*
Civil Action No. 1:23-cv-04771 (JPC)(SN)

Dear Judge Cronan:

This firm represents plaintiff Stelian Marin Popa ("Plaintiff") in the above-referenced action. We write, jointly with counsel for Defendants, to respectfully request an extension of the deadlines set forth in the Court's October 2, 2023 Order regarding Plaintiff's anticipated motion to dismiss the counterclaims asserted by Defendants. (Dkt. No. 20 [the "Oct. 2 Order"]).

As stated in the parties' September 28, 2023 Joint Letter (Dkt. No. 19), the parties have continued their settlement negotiations following the initial mediation session held on September 12, 2023. At this moment, Plaintiffs expect to receive a counteroffer to their last settlement demand by the end of next week. In order to allow the parties to concentrate on their settlement discussions, the parties propose an approximately 30-day extension to the current briefing schedule set forth in the Oct. 2 Order, as follows: Plaintiff to file the motion to dismiss by December 1, 2023, Defendants' opposition due by December 22, 2023, and any reply due by January 2, 2024.

This is the second request to extend the current briefing schedule, and it is made on consent of all parties.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Brent E. Pelton

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cc: All counsel (via ECF)

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